

Exhibit 56

Certified Copy

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY**

RICARDO RIMONDI and)
PILAR RIMONDI,)
Plaintiffs,)
vs.) DOCKET NO.
BASF CATALYSTS LLC, et al.,) MID-L-2912-17
Defendants.)

JOANNA RUMAN and)
JACENTY RUMAN,)
Plaintiffs,)
vs.) DOCKET NO.
BASF CATALYSTS LLC, et al.,) MID-L-2919-17
Defendants.)

DEPOSITION OF

WILLIAM E. LONGO, PhD

January 7, 2019

10:30 a.m.

11555 Medlock Bridge Road
Suite 100
Johns Creek, Georgia

Debra R. Luther, RMR, CRR, CCR-B-881



1 any documents or published literature that suggests
2 there is richterite in Johnson & Johnson mines' talc?

3 A. Again, for the same answer.

4 MR. EWALD: Okay. So I don't know if
5 anyone on the phone wants to ask questions. If
6 not, I'll take a very short break to make sure I
7 haven't missed something. Otherwise, I'll pass
8 the witness.

9 THE WITNESS: Thank you.

10 MR. GARSON: No, I don't have any.

11 MR. EWALD: Let me take 5 minutes, look
12 over my notes, I think we're done.

13 (Recess from 3:42 p.m. to 3:50 p.m.)

14 Q. (By Mr. Ewald) If someone says that PLM
15 is not sensitive enough to find asbestos in cosmetic
16 talc, that would be a false statement; correct?

17 A. Yes and no. As long as you have the
18 analyst and you've got experience over time in
19 looking at it, but if -- to say you'll never find it
20 in PLM, **it just depends on the experience and time**
21 **and individual doing it.**

22 Q. But at least in your view, MAS's analysts
23 have found asbestos in Johnson & Johnson's cosmetic
24 talc using PLM without any kind of heavy liquid
25 separation; correct?

1 A. This is true. And after doing this work
2 now specifically on cosmetic talc for two years, it
3 would be my opinion that the evaluation of cosmetic
4 talc, in my mind now, three things need to be done.
5 Forget about XRD unless you're looking at the
6 tremolitic talc out of Korea.

7 I believe you need to do -- if you want to
8 fully characterize -- ISO PLM, Blount PLM, and TEM.
9 All three of those methods give you the best ability
10 to make a determination if asbestos is present or not
11 at these detection limits, and it has to be an
12 analyst doing the PLM that has experience in looking
13 at these types of materials, so a lot of years. But
14 I believe all three of those need to be done.

15 If you're a talc mine, you don't stop at
16 negative -- you don't stop at a negative. If you
17 were to do ISO PLM or R-93 PLM and you find asbestos,
18 you can stop. If you don't find asbestos by ISO PLM,
19 you need to do the Blount PLM. If you find it by
20 Blount PLM, you can stop. That has detectable
21 asbestiform, tremolite or anthophyllite series. And
22 if you don't there, then you do TEM. Those are the
23 three that need to be done. You can skip the XRD.

24 Q. See, you talked and it made me think of a
25 couple questions.

C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF GWINNETT:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 131 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 10th day of January 2019.

Debra R. Luther
DEBRA R. LUTHER, B-881
Georgia Certified Court

